

intention of Repairify to waive the attorney-client privilege or any other applicable privilege or protection.

3. On June 9, 2023 I met and conferred with counsel for Defendant Keystone Automotive Industries (“Elitek”) regarding various discovery issues including concerning Elitek’s narrowing of its Request for Production No. 62. During this meet and confer I agreed to speak with Repairify regarding Elitek’s narrowed Request for Production No. 62, which I subsequently did.

4. I am informed that the individual who created the Excel spreadsheet produced as RPFY010586, which contains information obtained from the field study, is no longer employed with Repairify. I am further informed that Repairify has no knowledge that any other versions of the Excel spreadsheet produced as RPFY010586 were ever made and it has not been updated since that employee’s departure.

5. I do not know of any summaries, other than what is set forth on the document produced as RPFY010586 and, arguably the article that is RPFY010557. The document produced as RPFY010586 is a native Excel file and has a lot of information on it; it would not be very easy to print it out in a usable fashion. It contains, in part, [REDACTED]

[REDACTED]

[REDACTED]

6. Attached hereto as Exhibit A is a true and correct copy of email correspondence between counsel for the parties dated between July 14-19, 2023.

7. Attached hereto as Exhibit B is a true and correct copy of a document produced by Repairify in this case with beginning Bates No. RPFY010557.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of October 2023, in San Diego, California.

/s/ Arthur A. Wellman
Arthur A. Wellman, Jr.